

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Civil Action No. 6:21-cv-00361-ADA

**DEFENDANT DELL TECHNOLOGIES INC.'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Dell Technologies Inc. ("Dell") files this unopposed motion for extension of time to answer or otherwise respond to Plaintiff Sonrai Memory Limited's ("Plaintiff") Complaint (ECF No. 1).

Plaintiff filed its Complaint on April 12, 2021 (ECF No. 1). Dell's deadline to respond was set for May 12, 2021 (ECF No. 8). The undersigned counsel for Dell conferred with Plaintiff's counsel on May 5, 2021, and Plaintiff's counsel confirmed that they do not oppose the requested thirty-day extension.

Dell therefore respectfully requests an extension of time up to and including June 11, 2021, to answer or otherwise respond to the Complaint. No prior extension of time has been requested. Accordingly, Dell respectfully requests that the Court issue the attached proposed order extending Dell's time to answer or otherwise respond to Plaintiff's Complaint to June 11, 2021.

Dated: May 5, 2021

Respectfully submitted,

By: /s/ Michael J. Newton

Michael J. Newton (TX Bar No. 24003844)

Brady Cox (TX Bar No. 24074084)

**ALSTON & BIRD LLP**

2200 Ross Avenue, Suite 2300

Dallas, Texas 75201

Phone: (214) 922-3423

(214) 922-3443

Fax: (214) 922-3899

mike.newton@alston.com

brady.cox@alston.com

*Attorneys for Defendant Dell Technologies  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on May 5, 2021.

/s/ Michael J. Newton

Michael J. Newton